

CARMELO MILLAN

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1 (Whereupon, a discussion was held
2 off the record.)

3 (Whereupon, a recess was taken at
4 this time.)

5 BY MS. BOUCHARD:

6 Q. Mr. Millan, was there a swipe system where
7 you need to swipe in and out of the building?

8 A. We had card access to the buildings and stuff
9 like that.

10 Q. Were you supposed to use that to show when
11 you were in and out of the building?

12 A. No. There was no set procedure. It depended
13 on the site. I mean, you would sometimes swipe in and
14 not be able to swipe out.

15 Q. Isn't it true that when you were warned about
16 your attendance, that you were asked specifically to go
17 through the main door so that your swipes could be
18 tracked?

19 MS. WALSH: Objection to the form.

20 THE WITNESS: Yeah, I believe so.

21 BY MS. BOUCHARD:

22 Q. What types of equipment are in the lab that
23 you worked at in the Warren facility?

24 A. Servers, networking -- computer -- technology

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1 equipment.

2 Q. So servers, PCs?

3 A. Yeah.

4 Q. Various types of cables?

5 A. Yeah.

6 Q. Monitors?

7 A. Yeah -- well, a minimal amount of monitors.

8 But, yeah, there's monitors.

9 Q. Well, how do people work on their PCs if they
10 didn't have a monitor?

11 A. In the general, like, working area, there's
12 ten PCs with ten monitors. And in the data center
13 portion of the lab it was mostly servers. They would
14 get connected to a KVM system, a keyboard, video and
15 mouse system.

16 Q. You said all of this equipment approximates
17 about \$10 million in assets?

18 A. The insurance questionnaire will tell you for
19 sure.

20 I don't recall what the exact figures were.

21 I know it was --

22 Q. Around that?

23 A. Around that, sure.

24 (Whereupon, a discussion was held

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1 off the record.)

2 (Whereupon, Exhibits Millan-11
3 through and including Millan-16 were marked for
4 identification.)

5 BY MS. BOUCHARD:

6 Q. Mr. Millan, what's been marked as Millan-11
7 through Millan-16 are various Process Control Manuals.

8 I'm not going to take these page by page, but
9 I just want to confirm that what's been placed before
10 you as Exhibits 11 through 16 are the documents that
11 you created and then revised.

12 MS. WALSH: I'm going to object to
13 the form of the question.

14 THE WITNESS: Essentially, these
15 were created based on an existing template that
16 we received from our compliance and audit
17 departments, right.

18 So there's a lot of information in here
19 that was general to all of Citigroup, right. And
20 then there's information that was specific to the
21 lab.

22 I had input into the lab's specific
23 portion of it as far as like what the procedure
24 was for what we did, right.

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1 There was various authors involved in
2 this. I mean, Paul Holder was involved.
3 Denise Pavona, David Young, Marcella Medina,
4 Yesim Akdeniz and other people whose names I
5 might -- it was a working group. There was an
6 e-mail -- a list it was sent to.

7 So different people made different
8 revisions, and I implemented their revisions into
9 the document.

10 I was really more the caretaker for the
11 document, right, because it was for the global
12 engineering lab, and I was the only person
13 working in support of the lab, right.

14 So this was an audit framework for the
15 lab, right. Like, we were getting ready to be
16 audited, and essentially this agency came in and
17 hit the lab.

18 They wanted to have our procedures on
19 paper so they would know whether or not we were
20 compliant, right.

21 And really most of these procedures
22 weren't necessarily what was being followed.

23 It's what we needed to do to be compliant, right.

24 BY MS. BOUCHARD:

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1 Q. They were the best practices?

2 A. They were supposed to be the best practices,
3 yes.

4 Q. That's why they're called "best," right?

5 MS. WALSH: Objection.

6 THE WITNESS: I guess.

7 BY MS. BOUCHARD:

8 Q. I understood from your previous testimony,
9 though, that you were asked to create the first draft.

10 MS. WALSH: Objection.

11 THE WITNESS: I worked on the
12 Process Control Manual based on, like,
13 information I was given from different sources,
14 right.

15 BY MS. BOUCHARD:

16 Q. So you compiled it based on various people
17 giving you some input?

18 A. I'm pretty sure I was given the template,
19 right.

20 And then I was told what procedures in
21 regards to like my lab functions, right, my lab support
22 functions mapped to this, right.

23 So, for instance, like asset tracking, right,
24 if I'm receiving the equipment and I'm keeping track of

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1 the equipment and I'm installing the equipment, right,
2 how does what I do relate to the asset tracking?

3 **Q. So you wrote down those procedures as they**
4 **related to you?**

5 A. As they related to the lab or as they related
6 to how it should be done. I don't remember the scope
7 of this particular document.

8 At the time we were having conversations
9 about, right, how is it that we actually do this,
10 right, and how is it that it's supposed to be done
11 first to be compliant.

12 So various people had input into, you know,
13 what the risks for the Citigroup, what the risks were
14 within the lab environment, so on and so forth.

15 **Q. So when it says, "key job responsibilities,"**
16 **and it says, "oversight of control processes and**
17 **procedures for the CTI GE lab" --**

18 MS. WALSH: What are you referring
19 to?

20 BY MS. BOUCHARD:

21 **Q. I'm referring to your year-end Performance**
22 **Review. Section 1.**

23 MS. WALSH: Which exhibit?

24 BY MS. BOUCHARD:

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1 Q. I can just show you it. You don't need to --

2 MS. WALSH: Well, just for the
3 record, I just want to make sure that we have --
4 it's the 2005 midyear or year-end?

5 MS. BOUCHARD: Year-end.

6 MS. WALSH: Okay.

7 BY MS. BOUCHARD:

8 Q. Number 5; do you see that?

9 MS. WALSH: Just for the record,
10 it's Exhibit 7.

11 THE WITNESS: Number 5 here?

12 BY MS. BOUCHARD:

13 Q. No, Number 5 in the key job responsibilities.

14 A. Yeah.

15 Q. So that had to do with your oversight over
16 these manuals?

17 A. In regards to how they related to my job
18 function, yeah.

19 MS. BOUCHARD: Okay. That's all we
20 have.

21 MS. WALSH: I have a couple of
22 questions. Just give me a minute.

23 MS. BOUCHARD: Okay.

24 (Whereupon, a discussion was held

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1 off the record.)

2 EXAMINATION

3

4 BY MS. WALSH:

5 Q. Mr. Millan, you testified with respect to a
6 time inputting system or a system by which you recorded
7 the time that you spent doing various functions while
8 you worked for the lab; is that correct?

9 A. Correct.

10 Q. You testified specifically with respect to
11 reasons why certain months where that time is recorded
12 maybe reflect a zero; is that correct?

13 A. Yes.

14 Q. Is there any other reason why you can think
15 of that a certain month over the course of your time
16 working for the lab, might be recorded as zero?

17 A. It could have been due to vacation time. It
18 could have been due to the system being closed out at
19 the end of the month.

20 Sometimes it would end like on odd days. So
21 you might not be able to input your time, right. So
22 I'm not -- that might have been the reason it wasn't in
23 there.

24 The system, some months closed like on an odd

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1 day. Like on a holiday or -- it was different. The
2 timing, it wasn't consistent the time they closed.

3 They closed it for processing at the end of
4 every month, right. So if your time was logged and you
5 didn't input it into the system, right, it might not
6 necessarily reflect within the system.

7 Q. So, for example --

8 A. If the computer network went down and, you
9 know, you weren't able to access the network to get on
10 TRS, you wouldn't be able to get in there.

11 Q. Or, for example, if you were on vacation on a
12 day that the system closed down, would that be a reason
13 why your monthly --

14 A. Right.

15 Q. Let me just finish.

16 -- why your monthly time wouldn't be
17 correctly reflected in the time keeping system?

18 A. If you were on vacation or if you were sick,
19 so on and so forth, yeah, that might reflect.

20 Q. You testified with respect to a number of
21 different functions that your performed while you were
22 working for the lab at both the 388 facility and the
23 Warren facility.

24 Can you tell me was there one function that

1 took up most of your time at the -- we'll start with
2 the 388 Greenwich facility.

3 A. Day-to-day support of the lab dealing with
4 troubles, dealing with installation, dealing with
5 receiving equipment.

6 Q. Can you estimate for me at the 388 Greenwich
7 facility, what percentage of your time did those
8 specific tasks take up?

9 A. At least 80 percent. Sometimes 90.

10 Q. With respect to the Warren facility, can you
11 do the same analysis for me?

12 A. After we were done with the migration, which
13 was probably a period of like six months, same deal.

14 MS. WALSH: All right. I don't
15 have any further questions.

16 MS. BOUCHARD: Okay. Nothing
17 further.

18 (Whereupon the deposition was
19 adjourned for the day at approximately 3:35 p.m.)
20
21
22
23
24

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CERTIFICATION

I HEREBY CERTIFY that the proceedings and evidence are contained fully and accurately in the stenographic notes taken by me upon the foregoing matter on Wednesday, January 16, 2008, and that this is a correct transcript of same.

CHARLES P. CARMODY

Registered Professional

Reporter and Notary Public

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CARMELO MILLAN

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1 WITNESS INSTRUCTIONS FOR READING AND SIGNING
2 TRANSCRIPT
3
4

5 You have elected to exercise your right to read and
6 sign this transcript upon completion of your deposition
7 testimony. Please note that you have thirty (30) days
8 to read the transcript, make gramatical or spelling
9 changes, list them on the Errata Sheet, and sign your
10 name to the Witness Signature Page, and then return the
11 Original Transcript, along with the Witness Signature
12 Page and Errata Sheet to your counsel, or your rights
13 to read and sign will be deemed waived, according to
14 the rules of civil procedure.

15 The rules do not permit you to make any changes to
16 your testimony. Please do not write, mark or make any
17 corrections to the actual text of the transcript. All
18 corrections are to be listed on the Errata Sheet, with
19 the page and line number of each correction noted. The
20 Errata Sheet and Witness Signature Page, along with
21 these instructions, are the final three pages of the
22 transcript.

23 Upon completion, please forward to all counsel
24 listed on page two in attendance of the transcript
a copy of the Errata Sheet and Witness Signature Page.
The Original Errata Sheet and Original Witness
Signature Page should be returned to the attorney who
conducted your Direct Examination in order that it be
attached to the Original Transcript of your deposition
which will be filed with the Court.

DATE TRANSCRIPT SHIPPED:

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WITNESS SIGNATURE PAGE

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I have read the foregoing transcript of my deposition given on Wednesday, January 16, 2008, and find it to be true, correct and complete to the best of my knowledge, recollection and belief, except for any corrections noted hereon and/or list of corrections, if any, attached on a separate sheet herewith.

CARMELO MILLAN

Subscribed and sworn to before me this

day of , 2008.

Notary Public

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1	ERRATA SHEET	
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3	PAGE, LINE	CORRECTION
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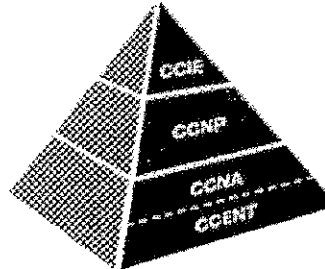


Career Certifications & Paths

CCNA

CCNA Certification

The Cisco CCNA network associate certification validates the ability to install, configure, operate, and troubleshoot medium-size routed and switched networks, including implementation and verification of connections to remote sites in a WAN. This new curriculum includes basic mitigation of security threats, introduction to wireless networking concepts and terminology, and performance-based skills. This new curriculum also includes (but is not limited to) the use of these protocols: IP, Enhanced Interior Gateway Routing Protocol (EIGRP), Serial Line Interface Protocol Frame Relay, Routing Information Protocol Version 2 (RIPv2), VLANs, Ethernet, access control lists (ACLs)



CCNA Instant Answers

CCNA Prerequisites

No prerequisites

CCNA Exams & Recommended Training

Required Exam(s)

640-802 CCNA

Recommended Training

Interconnecting Cisco Networking Devices Part 1 (ICND1) v1.0
Interconnecting Cisco Networking Devices Part 2 (ICND2) v1.0

OR

Required Exam(s)

640-822 ICND1

640-816 ICND2

Recommended Training

Interconnecting Cisco Networking Devices Part 1 (ICND1) v1.0

Interconnecting Cisco Networking Devices Part 2 (ICND2) v1.0

Additional Training

The [CCNA Prep Center](#) includes sample questions, simulations, e-learning modules, labs, tips from CCNA professionals, expert advice, success stories, along with other CCNA resources to help students preparing for CCNA certification exams.

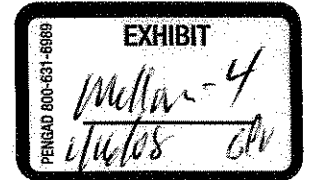
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Interconnecting Cisco Networking Devices Part 1 (ICND1) v1.0

**Associated
Certifications:** CCENT

Duration: 5 days,Virtual Classroom
hours,Web Based Training
5 days,Classroom
5 days,Remote Labs & Simulations

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Prerequisites

None

Course Content

This course focuses on providing the skills and knowledge necessary to install, operate, and troubleshoot a small branch office Enterprise network, including configuring a switch, a router, and connecting to a WAN and implementing network security. A Student should be able to complete configuration and implementation of a small branch office network under supervision.

Course Objectives

Upon completion of this course, you should be able to:

- Describe how networks function, identifying major components, function of network components and the Open System Interconnection (OSI) reference model.
- Using the host-to-host packet delivery process, describe issues related to increasing traffic on an Ethernet LAN and identify switched LAN technology solutions to Ethernet networking issues.
- Describes the reasons for extending the reach of a LAN and the methods that can be used with a focus on RF wireless access.
- Describes the reasons for connecting networks with routers and how routed networks transmit data through networks using TCP / IP.
- Describe the function of Wide Area Networks (WANs), the major devices of WANs, and configure PPP encapsulation, static and dynamic routing, PAT and RIP routing.
- Use the command-line interface to discover neighbors on the network and managing the router's startup and configuration .

Course Outline

- Module 1 - Building a Simple Network
- Module 2 - Ethernet Local Area Networks

- Module 3 - Wireless Local Area Networks
- Module 4 - Exploring the Functions of Routing
- Module 5 - Wide Area Networks
- Module 6 - Network Environment Management

Who Should Attend

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Interconnecting Cisco Networking Devices Part 2 (ICND2) v1.0

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hours, Web Based Training
5 days, Classroom
5 days, Remote Labs & Simulations

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Prerequisites

ICND1

Course Content

This course focuses on providing the skills and knowledge necessary to install, operate, and troubleshoot a small to medium-size branch office Enterprise network, including configuring several switches and routers, connecting to a WAN and implementing network security.

Course Objectives

- Review how to configure and troubleshoot a small network.
- Expand the switched network from a small LAN to a medium-sized LAN with multiple switches, supporting VLANs, trunking, and spanning tree.
- Describe routing concepts as they apply to a medium-sized network and discuss considerations when implementing routing on the network.
- Configure, verify, and troubleshoot OSPF.
- Configure, verify, and troubleshoot EIGRP.
- Determine how to apply ACLs based on network requirements, and to configure, verify, and troubleshoot ACLs on a medium-sized network.
- Describe when to use NAT or PAT on a medium-sized network, and configure NAT or PAT on routers.
- Identify and implement the appropriate WAN technology based on network requirements.

Course Outline

Module 1 - Small Network Implementation

Module 2 - Medium-Sized Switched Network Construction

Module 3 - Medium-Sized Routed Network Construction



Learning Offerings

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Module 4 - Single Area OSPF Implementation

Module 5 - EIGRP Implementation

Module 6 - Access Control Lists

Module 7 - Address Space Management

Module 8 - LAN Extensionin to a WAN

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None

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Learning Offerings

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